"if it is determined that PVC interworking is normally performed analyzing the message received from the destination side, to perform the next step, if not, to perform the 13 step (S213)" (col. 9, lines 10-13).

As step S203 retrieves the frame relay connection information that was output at the time of step S113, step S113 must necessarily precede step S203. Consequently, according to the teachings of Han et al., step S102 must necessarily precede step S210. Thus, the teachings of Han et al. contradict the Examiner's assertion that "Han discloses in Figs. 5-7, the subscribers register with network; the connection information is stored in the database when the interworking of the switch receive a call setup for established a PVC between the endpoint of the switches, step 210 and Fig. 1, the interworking unit must obtain the connection information of the destination switch in order to send a setup message to destination switch and determining the connection information is transparent or translation connection; if the connection is transparent then establishing a transparent link; See Figs. 8-10 and col 7, lines 26-30 as set forth in claims 1, 9, 13, and 18." As the processes of Han et al. do not establish a causal relationship that would allow step S102 of verifying an input parameter such as an Optional parameter that "appoints an upper layer protocol form (Transparent, Translation)" to occur in response to step S210 involving "analyzing the message received from the destination side," Han et al. logically cannot teach the purported teachings ascribed to Han et al. by the Examiner. Therefore, Applicant submits that the Examiner has not established a prima facie case of the teachings of Han et al. anticipating the rejected claims of the present application. Thus, Applicant submits that claims 1, 5-10, 13, and 17-19 are in condition for allowance.

Regarding claims 5 and 6, the Examiner states, "Han discloses the connection parameters comprising at least one of the upper layer protocol 'read on data transport protocol' and switch type and traffic descriptor 'read on PCR, Be, Bc, CIR' as set forth in claims 5 and 6." Applicant respectfully disagrees. Applicant notes that D_IN_ULPT 37 is described as illustrating "an upper layer protocol of the frame relay connection, means Transparent and Translation mode" (col. 5, lines 10-12). Applicant notes that the conjunctive union of Transparent and Translation in apparently a single mode in Han et al. appears to teach away from the claimed invention, even if one were able to determine that the terms Transparent and Translation of Han et al. have similar meanings to such terms in the present application (for which the Examiner has not presented evidence). Moreover, Applicant reiterates the argument presented above that information such as D_IN_ULPT 37, which is illustrated in Fig. 3(c) is

retrieved in step S203, which precedes step S210 involving "analyzing the message received from the destination side."

Moreover, Applicant respectfully disagrees with the Examiner's assertion that the "PCR, Be, Bc, CIR" of Han et al. discloses a switch type and an enhanced traffic descriptor such that an end-point switch is capable of processing an enhanced traffic descriptor. Rather, Han merely teaches that it "computes PCR (Peak Cell Rate) corresponded to CIR (Committed Information Rate)" (col. 5, line 67, to col. 6, line 1) and that a "BC (Committed Burst Size), Be (Excess Burst Rate)" are appointed (col. 7, lines 22-26), not that an end-point network switch is capable of processing an enhanced traffic descriptor. Thus, Applicant submits that claims 5 and 6 are in condition for allowance.

Regarding claim 7, the Examiner states that Han discloses the receiving party is a user, citing Fig. 5, subscriber. Applicant respectfully disagrees. Applicant submits that the cited portion of Fig. 5 does not disclose the limitations of claim 7 subject to the limitations of base claim 1. Thus, Applicant submits that claim 7 is in condition for allowance.

Regarding claims 8 and 17, the Examiner states that Han inherently discloses the service interworking being default to translation if the endpoint network does not support transparent link. However, the Examiner provides neither explanation nor citation of any portion of Han to support the Examiner's contention. Thus, Applicant respectfully disagrees and submits that claims 8 and 17 are in condition for allowance.

Regarding claims 10 and 19, the Examiner states that Han inherently discloses extracting an enhanced traffic descriptor which identifies the data transport protocol from the setup message to determine if the receiving party supports the data transport protocol of sending party in order to establish a transparent link between the users, stating that the interworking unit must extract protocol identifier in order to recognize if the destination interworking unit supports this protocol or not. However, Applicant submits that the Examiner does not cite any portion of Han to support the Examiner's contention. Moreover, even if the Examiner's inference were valid, it would not necessarily anticipate the claimed invention. Thus, Applicant submits that claims 10 and 19 are in condition for allowance.

The Examiner has allowed claims 11, 12, 20, and 21. The Examiner states that claims 2-4 and 14-16 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicant submits that, in view of Applicant's arguments for the

allowability of the claims from which claims 2-4 and 14-16 depend, that claims 2-4 and 14-16 are also in condition for allowance.

In conclusion, Applicant has overcome all of the Office's rejections, and early notice of allowance to this effect is earnestly solicited. If, for any reason, the Office is unable to allow the Application on the next Office Action, and believes a telephone interview would be helpful, the Examiner is respectfully requested to contact the undersigned attorney.

Respectfully submitted,

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